

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JOHN MCALLISTER,) Civil No. CV 04 00625SOM BMK
)
Plaintiff,) AFFIDAVIT OF GREGG M. USHIRODA
)
vs.)
)
UNIVERSITY OF HAWAI`I;)
KAPIOLANI COMMUNITY COLLEGE;)
JANE CALFEE, Instructor at)
Kapiolani Community College;)
RICHARD DOE, Academic Counselor)
at Kapiolani Community College;)
JILL MAGNAGON, Director of)
Academic Counseling at)
Kapiolani Community College;)
MONA LEE, Dean of Student)
Services at Kapiolani Community)
College,)
Defendants.)
)
)
)
_____)

AFFIDAVIT OF GREGG M. USHIRODA

STATE OF HAWAII)
) SS.
CITY AND COUNTY OF HONOLULU)

Having first been duly sworn upon oath, GREGG M.
USHIRODA hereby deposes and says that:

1. Affiant is duly licensed to practice law before
all courts in the State of Hawaii and is a member of Watanabe Ing
& Komeiji LLP, counsel for Defendant JANE CALFEE ("Defendant
CALFEE") in the above-captioned action.

2. On January 3, 2006, Watanabe Ing & Komeiji LLP
entered its appearance on behalf of Defendant CALFEE.

3. Attached hereto as Exhibit "A" is a true and correct copy of the Withdrawal and Substitution of Counsel for Defendant Jane Calfee, filed on January 3, 2006.

4. Upon information and belief, there are several areas and/or subjects that should be excluded from introduction at trial, and accordingly the subject of motions *in limine*.

5. Upon information and belief, the deadline to file motions *in limine* to this Court expired on October 25, 2005.

6. Upon information and belief, it appears that the deadline to file motions *in limine* was based upon an earlier trial date that has since been continued.

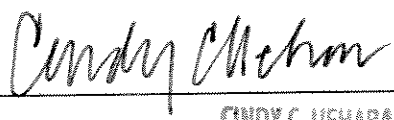
7. Upon information and belief, Defendant CALFEE would be unduly prejudiced if not allowed to at least attempt to exclude certain subjects/areas from introduction at trial.

Further Affiant sayeth naught.



GREGG M. USHIRODA

Subscribed and sworn to before me this
9th day of January, 2006

ls. 

CINDY C. UEHARA
Notary Public, State of Hawaii
My Commission expires: 3/8/07